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September 30, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Steven I. Locke, U.S.M.J.
100 Federal Plaza, Courtroom 820
Central Islip, NY 11722-4436

Re: Cardenas v. Vinny's General Contracting Inc., et ano.
Case No.: 2:25-cv-1248 (SIL)

Dear Judge Locke:

This firm represents the Plaintiff Alonso Cardenas ("Plaintiff") in the above-referenced case. The Plaintiff writes jointly with Defendants to respectfully request an extension of the fact discovery deadline, which falls on today's date, September 30, 2025.

On June 26, 2025, this Court so-Ordered the parties' joint proposed discovery schedule which was submitted on June 10, 2025. See ECF Docket Entry [14](#). As set forth in the parties' previous joint status report, the parties' mediation has been continued due to some discovery issues. See ECF Docket Entry [15](#).

Pursuant to ¶ II(b) of this Court's Individual Practice Rules: (i) the original date of the deadline to complete fact discovery is September 30, 2025; (ii) there have been no previous requests for an extension of time to complete fact discovery; (iii) all appearing parties join in this motion; (iv) the reason for the request is because the parties need additional time to complete limited discovery in an effort to reach a settlement at mediation as reported in the parties' previous joint status report; (v) no suggested adjournment dates are necessary for this request; and (vi) the parties will submit a proposed revised scheduling Order under separate cover.

In light of the foregoing, the parties respectfully submit that sufficient good cause exists for this Court to exercise its discretion in favor of granting the requested extensions of time. See Fed. R. Civ. P. 6(b)(1)(A).

The parties thank this Court for its time and attention to this case.

Dated: Jamaica, New York
September 30, 2025

Respectfully submitted,

SAGE LEGAL LLC

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